

1 JOHN P. MARGIOTTA  
2 *Pro Hac Vice*  
jmargiotta@fzlz.com  
3 SHELBY P. ROKITO  
4 Pro Hac Vice  
srokito@fzlz.com

5 FROSS ZELNICK LEHRMAN & ZISSU, P.C.  
6 151 W. 42nd Street, Floor 17  
New York, New York 10036  
Tel: (212) 813-5900

7 NAOMI JANE GRAY (SBN 230171)  
ngray@shadesofgray.law  
8 SHADES OF GRAY LAW GROUP, P.C.  
100 Shoreline Highway, Suite 100B  
9 Mill Valley, CA 94941  
Tel: (415) 746-9260

10 *Attorneys for Plaintiffs*  
11

SEPIDEH HERSEL (SBN 226017)  
sepideh@hersellawfirm.com  
HERSEL LAW FIRM  
8383 Wilshire Blvd., Suite 655  
Beverly Hills, CA 90211  
Tel: (714) 617-8336

*Attorneys for Defendants*

14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 CARTIER INTERNATIONAL AG and  
17 CARTIER, a division of RICHEMONT NORTH  
AMERICA, INC.,

Case No. 3:22-cv-02731-AGT (KAW)

**JOINT STATUS REPORT**

18 Plaintiffs,  
19 v.  
20 BURLWOOD GALLERY and KEN NADJIBI,  
21 Defendants.

Magistrate Judge: Hon. Alex G. Tse

Referred to Magistrate Judge:  
Hon. Kandis Westmore

23 The Parties submit this Joint Status Report pursuant to the Joint Notice of Settlement filed  
24 on November 29, 2022 (D.N. 34). The Joint Notice of Settlement stated that the Parties expected  
25 to file a consent judgment within 30 days. The Parties have finalized the terms of the consent  
26 agreement but will be unable to obtain the necessary signatures until after the end-of-year

27 //  
28 //

holidays. The Parties expect to file the consent judgment within another 30 days.

RESPECTFULLY SUBMITTED,

Dated: December 22, 2022

SHADES OF GRAY LAW GROUP, P.C.

By: /s/ Naomi Jane Gray  
Naomi Jane Gray (SBN 230171)

*Attorneys for Plaintiffs*

Dated: December 22, 2022

HERSEL LAW FIRM

By: /s/ Sepideh Hersel  
Sepideh Hersel (SBN 226017)

*Attorneys for Defendants*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

I, Naomi Jane Gray am the ECF User whose ID and password are being used to file this JOINT STATUS REPORT. In compliance with Civil L.R. 5-1, I hereby attest that the other signatory whose e-signature appears above has concurred with this filing.

Dated: December 22, 2022

## SHADES OF GRAY LAW GROUP, P.C.

By: /s/ Naomi Jane Gray  
Naomi Jane Gray (SBN 230171)

*Attorneys for Plaintiffs*